SOUTHERN DISTRICT OF NEW YORK	
x	
UNITED STATES OF AMERICA,	NOTICE OF MOTION
- v -	NOTICE OF WOTION
MOSHE MIRILASHVILI,	14 Cr. 810 (CM)
Defendant,	
V	

LIMITED OT ATEC DISTRICT COLIDT

PLEASE TAKE NOTICE that upon the accompanying memorandum of law and exhibits, the United States of America, by its attorney Preet Bharara, United States Attorney for the Southern District of New York, and Edward B. Diskant and Brooke E. Cucinella, Assistant United States Attorneys, will move this Court for rulings in advance of trial permitting the Government to offer evidence of (1) the expulsion of Moshe Mirilashvili (the "defendant") from the New York State Medicaid Program for fraudulent billing practices in 1993; (2) the revocation of the defendant's medical license in 1996 based on findings of professional misconduct and gross negligence in his treatment of patients; and (3) the terms of the probationary period the defendant was placed as a requirement to regain his license to practice medicine, as well as the conduct giving rise to those prior state actions, as direct evidence of the charged crime or in the alternative, pursuant to Fed. R. Evid. 404(b), as well as for such other relief as the Court deems just and proper.

Dated: New York, New York January 25, 2016

PREET BHARARA United States Attorney

By: /s/
Edward B. Diskant/Brooke E. Cucinella
Assistant U.S. Attorneys
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